

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: AUG 06 2019

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

JOHN LAMBERT,
a/k/a "Eric Pope,"
Defendant.

INFORMATION

19 Cr.

19 CRIM 571

COUNT ONE

JUDGE CAPRONI

(Conspiracy to Commit Wire Fraud)

The United States Attorney charges:

1. From at least in or about August 2016, up to and including at least in or about April 2018, in the Southern District of New York and elsewhere, JOHN LAMBERT, a/k/a "Eric Pope," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and object of the conspiracy that JOHN LAMBERT, a/k/a "Eric Pope," the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme or artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause

to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Information, JOHN LAMBERT, a/k/a "Eric Pope," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


GEOFFREY S. BERMAN
United States Attorney

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Defendant.

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(Title 18, United States Code, Section 1349)

GEOFFREY S. BERMAN

U.S. Attorney.
